

Pharmacy Operations during COVID-19

Suggestions to keep staff and patients safe

Updated 4/7/2020

The below are operational suggestions and clarification of existing authorities granted to pharmacies operating and pharmacists practicing in Maryland, and are not intended as official or legal guidance.

The CDC has issued Considerations for Pharmacies during the COVID-19 Pandemic, which may serve as a helpful resource for Maryland pharmacies and health care systems.

Employers and employees must comply with all federal, state, and local laws and regulations, and may be subject to additional business policies.

Ways to improve safety for patients receiving prescriptions

The following can protect patient safety while ensuring access to necessary medications:

- Advise patients to call ahead for refills or request refills online to reduce waiting time at pharmacy.
- Patients may inquire about the possibility of **early refills** on many prescription medication, with the exception of Schedule II medications which may not be refilled.
 - Carriers are required to waive any time restrictions on prescription medication refills and authorize payment to pharmacies for at least a 30-day supply of any prescription medication, regardless of the date upon which the prescription medication had most recently been filled by a pharmacist_{2,3}
- Encourage patients to obtain a prescription for a 90-day supply of maintenance medications in person or from mail order if offered through their insurance carrier; this should be considered for both CDS (controlled dangerous substance) prescriptions as well as non-Scheduled medications.4
- Start **delivering** prescriptions using a delivery driver or mailing prescriptions to reduce contact, or provide curb-side pick-up.

¹ Considerations for Pharmacies during the COVID-19 Pandemic, Center for Disease Control and Prevention. https://www.cdc.gov/coronavirus/2019-ncov/healthcare-resources/pharmacies.html

² Maryland Insurance Administration Bulletin 20-05. https://insurance.maryland.gov/Insurer/Documents/bulletins/Bulletin-20-05-Covid-19.pdf

³ Maryland Medicaid Advisory 206, March 11, 2020: Novel Coronavirus 2019 (COVID-19): Waiving Early Refill Edits. https://cdn.ymaws.com/www.marylandpharmacist.org/resource/resmgr/files/advisory 206 waiving early r.pdf ⁴ COMAR 10.

- Where allowed by carriers and pharmacy policy, **delivery verification** by signature should be temporarily replaced with phone call, text, or email to patient after delivery, or notation such as "Emergency COVID-19-Unable to Confirm Delivery" if allowed by a carrier⁵.
- Advise patients who are elderly and/or have underlying medical conditions, to stay home and ask a trusted family member, friend, or neighbor to visit the pharmacy to pick up their prescriptions; where possible, consider implementing free delivery of medications to patients at high risk.
- If vaccinations continue to be administered, social distancing is not possible. Therefore, ensure facility policies and practices are in place to minimize exposures to respiratory pathogens during the encounter, including appropriate use of personal protective equipment (PPE), such as recommended by CDC.6

Work environment for pharmacy staff safety

The following can be implemented within a pharmacy:

- Total pharmacy staff should be as few as necessary to complete essential functions in compliance with federal and state laws and regulations, and all staff should be conducting social distancing (remaining at least six feet from another person) throughout the day.
- The number of pharmacy staff members working behind the counter should be as minimal as workload allows. Operations may possibly be maintained with as few as three (3) total staff: a pharmacist, a pharmacy technician, and a cashier.
- Each staff member can remain at a designated work station without rotating work stations throughout the day. Example below (while each maintaining six-foot distance):
 - o Pharmacist at computer entering and checking prescriptions
 - o Pharmacy technician at production area filling prescriptions
 - o Cashier at cash register checking out patients
- Consider having a designated phone at or near each individual's workstation, requiring staff to only use their designated phone.
- At end of each staff member's shift, workstations should be cleaned with an approved cleaner, at all times wearing gloves. If split-shifts are implemented, consider having the pharmacy cleaned between shifts.
- Consider making some pharmacies closed-door pharmacies where there are minimal staff filling prescriptions, accepting no walk-in patients and all prescriptions are delivered or mailed.
- Posting notices for staff with general workplace safety recommendations, such as the COVID-19 posters from CDC7

Pharmacy staff actions to stay safe

The following can be implemented by essential pharmacy staff:

⁵ Maryland Medicaid Provider Alert. Follow-up Guidance on Temporary Signature-less Pharmaceutical Delivery, April 3,2020. https://mmcp.health.maryland.gov/Medicaid%20COVID19/9 Provider%20Alert-Clarifying%20guidance%20COVID-19-%209%20-%20April%203,%202020.pdf

⁶ https://www.cdc.goy/coronavirus/2019-ncoy/healthcare-resources/pharmacies.html

⁷ What every American and community can do now to decrease the spread of the coronavirus, Centers for Disease Control and Prevention (CDC). https://www.cdc.gov/coronavirus/2019-ncov/downloads/workplace-school-and-home-guidance.pdf

- Wear gloves, changing them often. Wash hands frequently and use hand sanitizer if unable to wash hands.
 - Keep hand sanitizer at the cash register and use after EACH patient is helped.
 - Keep hand sanitizer next to the computer and use after handling EACH paper prescription.
 - Staff should not touch their face, including eyes, nose and mouth while working.
- Keep your pen in the pocket of your lab coat and do not leave at the checkout counter where patients could touch or on the pharmacy counter for other staff to use.
- DO NOT take a patient's cell phone to speak with their doctor. Instead, ask the doctor to call the pharmacy phone number and you will speak with them on that line.
- Change lab coat at least daily, washing in hot water, detergent, and bleach daily

Maintaining social distancing practices while continuing pharmacy operations

The following can reduce or eliminate close contact between staff and patients:

- Ensure pharmacy staff can maintain a 6-foot distance from patients. Creative measures to enforce this barrier could include:
 - o If there is a narrow counter, consider placing blue painters' tape on the floor 6 feet from the cash register on the customer side of the counter and advising patients to not cross the tape line until instructed to pay for or pick up prescription, minimizing the amount of time individuals are in close proximity.
 - Add additional tables or counter extensions to ensure that six-foot distance is maintained between patient and pharmacy staff across the counter. Pass cash and prescriptions across the extended counter, and encourage the patient to use the credit card reader where possible.
- Wearing gloves, clean the counters where the patient is checked out and where the patient can speak to the pharmacist after each patient, or as frequently as possible.
- Keep only essential items on the counter where patients are checked out.
- DO NOT have any pharmacy landline phones at the checkout counter within reach of patients.
- Advise patients to keep a 6-foot distance from other patients in line at the pharmacy. Creative reminders of appropriate social distancing could include placing blue painter's tape on the floor at 6-foot intervals for patients as they stand in line at the pharmacy
- If seating is available in the waiting area, ensure that chairs are spaced at least 6 feet apart.
- Allow fewer than 10 individuals to remain in the pharmacy waiting area at any time.8
- Advise patients to cough or sneeze into their flexed elbow and not in hand.
- Message to patients about best practices through use of a sign hung in pharmacy waiting area, with instructions about keeping a 6 foot distance, following taped demarcations, and covering a cough.
- Advise patients not to remain in pharmacy longer than necessary. Advise customers to avoid bringing unnecessary individuals into a pharmacy.
- Pharmacies with a drive-thru window may consider encouraging or mandating (with applicable exceptions) their use to reduce the number of patients in the waiting area.

⁸ Order of the Governor of the State of Maryland Number 20-03-19-01. https://governor.maryland.gov/wp-content/uploads/2020/03/Amending-Gatherings.pdf

Additional Resources

- For the latest information and resources about COVID-19 in Maryland, visit the site maintained by the Maryland Department of Health: coronavirus.maryland.gov/
- Maryland Board of Pharmacy COVID-19 guidance: https://health.maryland.gov/pharmacy/Pages/index.aspx
- Office of Controlled Substances Administration (OCSA) CDS Prescriber and Dispenser FAQs: https://health.maryland.gov/OCSA/Pages/home.ASPX
- The Drug Enforcement Administration (DEA) has issued guidance related to Controlled Dangerous Substances (CDS) and COVID-19: https://www.deadiversion.usdoj.gov/coronavirus.html
- Centers for Disease Control and Prevention (CDC) COVID-19 Interim Guidnace for Business and Employers: https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html
- Occupational Safety and Health Administration (OSHA) COVID-19 resources: https://www.osha.gov/SLTC/covid-19/
- International Pharmaceutical Federation (FIP) Health Advisory: Coronavirus SARS-CoV-2 /
 COVID-19 Pandemic: Information and interim guidelines for pharmacists and the pharmacy
 workforce: https://www.fip.org/files/content/priority-areas/coronavirus/Coronavirus-guidance-update-ENGLISH.pdf